

ESTTA Tracking number: **ESTTA469098**

Filing date: **04/25/2012**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Notice of Opposition

Notice is hereby given that the following party opposes registration of the indicated application.

Opposer Information

Name	MasterCard International Incorporated
Granted to Date of previous extension	07/11/2012
Address	2000 Purchase Street Purchase, NY 10577-2405 UNITED STATES
Attorney information	Paul J. Reilly Baker Botts L.L.P. 30 Rockefeller Plaza New York, NY 10112-4498 UNITED STATES nytmdpt@bakerbotts.com Phone:212-408-2500

Applicant Information

Application No	85297027	Publication date	03/13/2012
Opposition Filing Date	04/25/2012	Opposition Period Ends	07/11/2012
Applicant	Konectome, Inc 301 Mission Street San Francisco, CA 94105 UNITED STATES		

Goods/Services Affected by Opposition

Class 042.


All goods and services in the class are opposed, namely: Computer services, namely, creating an on-line community for registered users to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; Computer services, namely, creating an online community for registered users to participate in competitions, showcase their skills, get feedback from their peers, form virtual communities, and engage in social networking; computer services, namely, software development and integration services, computer programming, design and development of computer games, video games, online games, game related applications and development tools for others; providing a website featuring non-downloadable software tools for use in accessing, playing and tracking performance of computer games; application service provider featuring software for social networking and games, and to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information via the Internet; computer programming services, namely, content creation for virtual worlds and three dimensional platforms


Grounds for Opposition

Priority and likelihood of confusion	Trademark Act section 2(d)
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Dilution	Trademark Act section 43(c)
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Marks Cited by Opposer as Basis for Opposition

U.S. Registration No.	1257853	Application Date	04/02/1980
Registration Date	11/15/1983	Foreign Priority Date	NONE
Word Mark	MASTERCARD		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 1980/02/11 First Use In Commerce: 1980/02/11 Financial Services-Namely, Providing Bank Card Services		

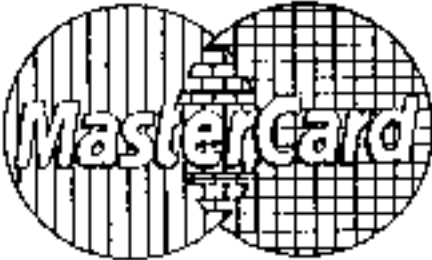
U.S. Registration No.	1270220	Application Date	01/26/1981
Registration Date	03/13/1984	Foreign Priority Date	NONE
Word Mark	MASTERCARD TRAVELERS CHEQUE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 1980/12/09 First Use In Commerce: 1980/12/09 Travelers Check Services-Namely, Administration of Issuance, Redemption and Processing of Travelers Checks		

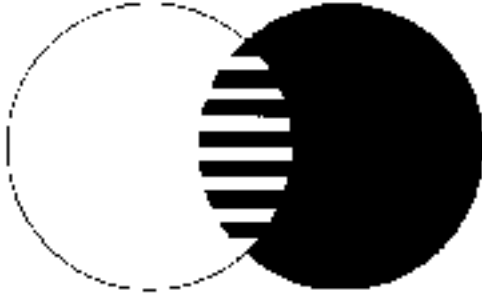
U.S. Registration No.	1723718	Application Date	10/25/1991
Registration Date	10/13/1992	Foreign Priority Date	NONE
Word Mark	NONE		

Design Mark	
Description of Mark	NONE
Goods/Services	<p>Class 016. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 printed matter and publications; namely, credit, debit and charge cards, travellers cheques, pamphlets, brochures, newsletters and magazines of a financial nature</p> <p>Class 036. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 financial services; namely, providing credit, debit and charge card, travellers cheque, cash disbursement, and transaction authorization and settlement services</p>

U.S. Registration No.	1738276	Application Date	02/19/1991
Registration Date	12/08/1992	Foreign Priority Date	NONE
Word Mark	MASTERCARD		
Design Mark			
Description of Mark	The mark consists of the words "MASTERCARD" with a globe design.		
Goods/Services	<p>Class 016. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 printed matter and publications; namely, credit cards and debit cards, pamphlets, brochures, newsletters and magazines of a financial nature</p> <p>Class 036. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 financial services; namely, providing credit card, debit card, cash disbursement, and transaction authorization and settlement services</p>		

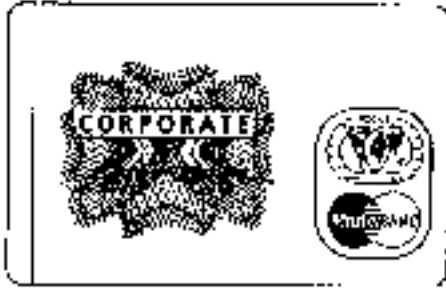
U.S. Registration No.	1890786	Application Date	01/21/1993
Registration Date	04/25/1995	Foreign Priority Date	NONE
Word Mark	MASTERCARD		

Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 006. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 metal key chains</p> <p>Class 009. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 calculators</p> <p>Class 014. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 watches, clocks, metal tie pins</p> <p>Class 016. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 pens, pencils, pen stands, paper weights, letter openers, notebooks, metal book marks</p> <p>Class 018. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 umbrellas, luggage, garment bags for travel, toiletry cases sold empty, duffel bags, attache cases, carry-on bags, tote bags, wallets, business card cases, credit card cases</p> <p>Class 020. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 non-metal key rings, luggage tags</p> <p>Class 021. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 mugs</p> <p>Class 024. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 towels</p> <p>Class 025. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 shirts, jackets, sweaters, sweat shirts, visors, caps</p> <p>Class 028. First use: First Use: 1991/04/00 First Use In Commerce: 1991/04/00 Christmas tree decorations, tennis balls, golf balls, soccer balls, golf tees</p>		
U.S. Registration No.	2038134	Application Date	03/09/1995
Registration Date	02/18/1997	Foreign Priority Date	NONE
Word Mark	NONE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 009. First use: First Use: 1992/08/19 First Use In Commerce: 1992/08/19 electronic data carriers in the form of magnetically encoded cards Class 016. First use: First Use: 1992/08/19 First Use In Commerce: 1992/08/19 printed matter and publications, namely, pamphlets, brochures, newsletters and magazines of a financial nature Class 036. First use: First Use: 1992/08/19 First Use In Commerce: 1992/08/19 financial services, namely, providing debit card services

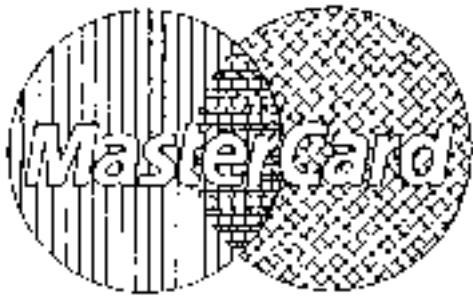
U.S. Registration No.	2077221	Application Date	04/23/1996
Registration Date	07/08/1997	Foreign Priority Date	NONE
Word Mark	MASTERCARD		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 1993/04/00 First Use In Commerce: 1993/04/00 travelers cheque services, namely the administration of [issuance,] redemption and processing of travelers cheques		


U.S. Registration No.	2212340	Application Date	04/21/1997
Registration Date	12/22/1998	Foreign Priority Date	NONE
Word Mark	MASTERCARD CORPORATE		

Design Mark	
Description of Mark	NONE
Goods/Services	Class 036. First use: First Use: 1997/01/31 First Use In Commerce: 1997/01/31 financial services, namely, providing credit card, debit card, [charge card and stored value prepaid card,] cash disbursement, and transaction authorization and settlement services


U.S. Registration No.	3356377	Application Date	08/10/2006
Registration Date	12/18/2007	Foreign Priority Date	NONE
Word Mark	NONE		
Design Mark			
Description of Mark	The mark consists of the design of intersecting circles that fades from red to pink to orange to yellow.		
Goods/Services	Class 035. First use: First Use: 2006/06/27 First Use In Commerce: 2006/06/27 Association services, namely, promoting the interests of banks, credit unions, and other regulated financial institutions		

U.S. Registration No.	2168736	Application Date	01/29/1993
Registration Date	06/30/1998	Foreign Priority Date	NONE
Word Mark	MASTERCARD		

Design Mark	
Description of Mark	NONE
Goods/Services	<p>Class 009. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 electronic data carriers in the form of magnetically encoded cards</p> <p>Class 016. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 printed matter and publications, namely, credit, debit and charge cards, travelers cheques, and pamphlets, brochures, newsletters and magazines of a financial nature</p> <p>Class 036. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 financial services, namely, providing credit, debit and charge card services, administration of the issuance, redemption and processing of travelers cheques, travel financial assistance, cash disbursement and transaction authorization and settlement services</p> <p>Class 039. First use: First Use: 1990/02/00 First Use In Commerce: 1990/02/00 travel assistance services, namely, arranging travel tours, making replacement and emergency reservations and booking for transportation</p>

U.S. Application No.	85440050	Application Date	10/05/2011
Registration Date	NONE	Foreign Priority Date	NONE
Word Mark	CIRRUS		
Design Mark			
Description of Mark	The mark consists of The word mark CIRRUS superimposed across two interlocking circles with horizontal lines in the portion of the circles that interlock. The left circle is dark blue and the right circle is a lighter shade of blue.		
Goods/Services	Class 036. First use: First Use: 1992/06/01 First Use In Commerce: 1992/06/01 Financial services, namely, cash disbursement through use of automatic teller machines and automatic teller machine (ATM) banking services		

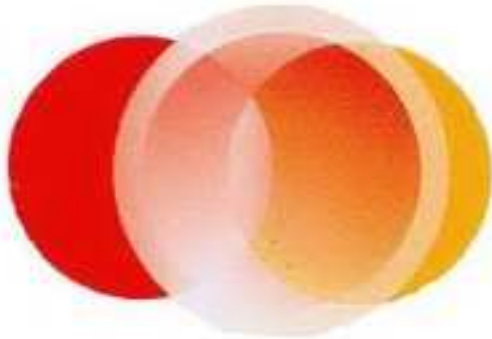
U.S. Registration	3356407	Application Date	08/17/2006
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No.			
Registration Date	12/18/2007	Foreign Priority Date	NONE
Word Mark	MASTERCARD WORLDWIDE		
Design Mark			
Description of Mark	<p>The mark consists of the words MASTERCARD WORLDWIDE in the color gray and the design of intersecting circles that fade from red to pink to orange to yellow. The mark is depicted on a gray background. No claim is made to the gray background, the background merely indicates depth.</p>		
Goods/Services	<p>Class 036. First use: First Use: 2006/06/27 First Use In Commerce: 2006/06/27 FINANCIAL SERVICES, NAMELY, BANKING AND CREDIT SERVICES; PROVIDING CREDIT CARD, DEBIT CARD, CHARGE CARD AND STORED VALUE PREPAID CARD SERVICES; BANKING SERVICES, BILL PAYMENT, CREDIT CARD SERVICES, DEBIT CARD SERVICES, CHARGE CARD SERVICES, CASH DISBURSEMENT, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; BILL PAYMENT SERVICES; AUTOMATED TELLER MACHINE SERVICES; PROCESSING OF ELECTRONIC BILL PAYMENT FINANCIAL TRANSACTIONS ON-LINE VIA A COMPUTER DATABASE OR VIA TELECOMMUNICATIONS AND AT POINT OF SALE; ELECTRONIC BILL PAYMENT PROCESSING SERVICES FOR FINANCIAL TRANSACTIONS BY CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; THE PROVISION OF BALANCE DETAILS, DEPOSITS AND WITHDRAWALS OF MONEY TO CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; FINANCIAL SETTLEMENT AND AUTHORIZATION SERVICES RELATING TO PAYMENT CARD TRANSACTIONS; ISSUING AND REDEMPTION OF TRAVELLERS CHECKS; CHECK VERIFICATION AND CHECK CASHING SERVICES; VERIFICATION OF FINANCIAL INFORMATION; PAYER AUTHENTICATION SERVICES, NAMELY, PROVISION OF SERVICES RELATING TO THE AUTHENTICATION OF CARDHOLDERS, MERCHANTS AND BANKS FOR PAYMENT CARD TRANSACTIONS; ELECTRONIC FUNDS TRANSFER AND CURRENCY EXCHANGE SERVICES; DISSEMINATION OF FINANCIAL INFORMATION VIA THE INTERNET AND OTHER COMPUTER NETWORKS; REMOTE BILL PAYMENT SERVICES; STORED VALUE ELECTRONIC PURSE SERVICES, NAMELY, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; PROVIDING ELECTRONIC FUNDS AND CURRENCY TRANSFER SERVICES, ELECTRONIC BILL PAYMENTS SERVICES, PREPAID TELEPHONE CALLING CARD SERVICES, CASH DISBURSEMENT SERVICES, AND TRANSACTION AUTHORIZATION AND SETTLEMENT SERVICES; PROVISION OF DEBIT CARD, CREDIT CARD AND PREPAID CARD SERVICES BY MEANS OF RADIO FREQUENCY IDENTIFICATION DEVICES; PROVISION OF DEBIT CARD AND CREDIT CARD SERVICES BY MEANS OF COMMUNICATION AND TELECOMMUNICATION DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED THROUGH MOBILE TELECOMMUNICATIONS MEANS,</p>		

	INCLUDING PAYMENT SERVICES THROUGH WIRELESS DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED ON-LINE, THROUGH NETWORKS OR OTHER ELECTRONIC MEANS USING ELECTRONICALLY DIGITIZED INFORMATION; PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT FOR USE IN THE SECURE EXCHANGE OF VALUE, INCLUDING ELECTRONIC CASH, OVER COMPUTER NETWORKS, ON-LINE BANKING; FINANCIAL INFORMATION PROCESSING SERVICES PROVIDED OVER THE TELEPHONE AND BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET; PROVISION OF FINANCIAL INFORMATION PROCESSING SERVICES BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET
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U.S. Registration No.	3356408	Application Date	08/17/2006
Registration Date	12/18/2007	Foreign Priority Date	NONE
Word Mark	MASTERCARD WORLDWIDE		
Design Mark			
Description of Mark	NONE		
Goods/Services	<p>Class 036. First use: First Use: 2006/06/27 First Use In Commerce: 2006/06/27</p> <p>FINANCIAL SERVICES, NAMELY, BANKING AND CREDIT SERVICES; PROVIDING CREDIT CARD, DEBIT CARD, CHARGE CARD AND STORED VALUE PREPAID CARD SERVICES; BANKING SERVICES, BILL PAYMENT, CREDIT CARD SERVICES, DEBIT CARD SERVICES, CHARGE CARD SERVICES, CASH DISBURSEMENT, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; BILL PAYMENT SERVICES; AUTOMATED TELLER MACHINE SERVICES; PROCESSING OF ELECTRONIC BILL PAYMENT FINANCIAL TRANSACTIONS ON-LINE VIA A COMPUTER DATABASE OR VIA TELECOMMUNICATIONS AND AT POINT OF SALE; ELECTRONIC BILL PAYMENT PROCESSING SERVICES FOR FINANCIAL TRANSACTIONS BY CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; THE PROVISION OF BALANCE DETAILS, DEPOSITS AND WITHDRAWALS OF MONEY TO CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; FINANCIAL SETTLEMENT AND AUTHORIZATION SERVICES RELATING TO PAYMENT CARD TRANSACTIONS; ISSUING AND REDEMPTION OF TRAVELLERS CHECKS; CHECK VERIFICATION AND CHECK CASHING SERVICES; VERIFICATION OF FINANCIAL INFORMATION; PAYER AUTHENTICATION SERVICES, NAMELY, PROVISION OF SERVICES RELATING TO THE AUTHENTICATION OF CARDHOLDERS, MERCHANTS AND BANKS FOR PAYMENT CARD TRANSACTIONS; ELECTRONIC FUNDS TRANSFER AND CURRENCY EXCHANGE SERVICES; DISSEMINATION OF FINANCIAL INFORMATION VIA THE INTERNET AND OTHER COMPUTER NETWORKS; REMOTE BILL PAYMENT SERVICES; STORED VALUE ELECTRONIC PURSE SERVICES,</p>		

	NAMELY, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; PROVIDING ELECTRONIC FUNDS AND CURRENCY TRANSFER SERVICES, ELECTRONIC BILL PAYMENTS SERVICES, PREPAID TELEPHONE CALLING CARD SERVICES, CASH DISBURSEMENT SERVICES, AND TRANSACTION AUTHORIZATION AND SETTLEMENT SERVICES; PROVISION OF DEBIT CARD, CREDIT CARD AND PREPAID CARD SERVICES BY MEANS OF RADIO FREQUENCY IDENTIFICATION DEVICES; PROVISION OF DEBIT CARD AND CREDIT CARD SERVICES BY MEANS OF COMMUNICATION AND TELECOMMUNICATION DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED THROUGH MOBILE TELECOMMUNICATIONS MEANS, INCLUDING PAYMENT SERVICES THROUGH WIRELESS DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED ON-LINE, THROUGH NETWORKS OR OTHER ELECTRONIC MEANS USING ELECTRONICALLY DIGITIZED INFORMATION; PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT FOR USE IN THE SECURE EXCHANGE OF VALUE, INCLUDING ELECTRONIC CASH, OVER COMPUTER NETWORKS, ON-LINE BANKING; FINANCIAL INFORMATION PROCESSING SERVICES PROVIDED OVER THE TELEPHONE AND BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET; PROVISION OF FINANCIAL INFORMATION PROCESSING SERVICES BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET
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U.S. Registration No.	3356409	Application Date	08/17/2006
Registration Date	12/18/2007	Foreign Priority Date	NONE
Word Mark	NONE		
Design Mark			
Description of Mark	The mark consists of the design of intersecting circles that fades from red to pink to orange to yellow.		
Goods/Services	Class 036. First use: First Use: 2006/06/27 First Use In Commerce: 2006/06/27 FINANCIAL SERVICES, NAMELY, BANKING AND CREDIT SERVICES; PROVIDING CREDIT CARD, DEBIT CARD, CHARGE CARD AND STORED VALUE PREPAID CARD SERVICES; BANKING SERVICES, BILL PAYMENT, CREDIT CARD SERVICES, DEBIT CARD SERVICES, CHARGE CARD SERVICES, CASH DISBURSEMENT, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; BILL PAYMENT SERVICES; AUTOMATED TELLER MACHINE SERVICES; PROCESSING OF ELECTRONIC BILL PAYMENT FINANCIAL TRANSACTIONS ON-LINE VIA A COMPUTER DATABASE OR VIA TELECOMMUNICATIONS AND AT POINT OF SALE; ELECTRONIC BILL PAYMENT PROCESSING SERVICES FOR FINANCIAL TRANSACTIONS BY CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; THE PROVISION OF BALANCE DETAILS, DEPOSITS AND		

	<p>WITHDRAWALS OF MONEY TO CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; FINANCIAL SETTLEMENT AND AUTHORIZATION SERVICES RELATING TO PAYMENT CARD TRANSACTIONS; ISSUING AND REDEMPTION OF TRAVELLERS CHECKS; CHECK VERIFICATION AND CHECK CASHING SERVICES; VERIFICATION OF FINANCIAL INFORMATION; PAYER AUTHENTICATION SERVICES, NAMELY, PROVISION OF SERVICES RELATING TO THE AUTHENTICATION OF CARDHOLDERS, MERCHANTS AND BANKS FOR PAYMENT CARD TRANSACTIONS; ELECTRONIC FUNDS TRANSFER AND CURRENCY EXCHANGE SERVICES; DISSEMINATION OF FINANCIAL INFORMATION VIA THE INTERNET AND OTHER COMPUTER NETWORKS; REMOTE BILL PAYMENT SERVICES; STORED VALUE ELECTRONIC PURSE SERVICES, NAMELY, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; PROVIDING ELECTRONIC FUNDS AND CURRENCY TRANSFER SERVICES, ELECTRONIC BILL PAYMENTS SERVICES, PREPAID TELEPHONE CALLING CARD SERVICES, CASH DISBURSEMENT SERVICES, AND TRANSACTION AUTHORIZATION AND SETTLEMENT SERVICES; PROVISION OF DEBIT CARD, CREDIT CARD AND PREPAID CARD SERVICES BY MEANS OF RADIO FREQUENCY IDENTIFICATION DEVICES; PROVISION OF DEBIT CARD AND CREDIT CARD SERVICES BY MEANS OF COMMUNICATION AND TELECOMMUNICATION DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED THROUGH MOBILE TELECOMMUNICATIONS MEANS, INCLUDING PAYMENT SERVICES THROUGH WIRELESS DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED ON-LINE, THROUGH NETWORKS OR OTHER ELECTRONIC MEANS USING ELECTRONICALLY DIGITIZED INFORMATION; PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT FOR USE IN THE SECURE EXCHANGE OF VALUE, INCLUDING ELECTRONIC CASH, OVER COMPUTER NETWORKS, ON-LINE BANKING; FINANCIAL INFORMATION PROCESSING SERVICES PROVIDED OVER THE TELEPHONE AND BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET; PROVISION OF FINANCIAL INFORMATION PROCESSING SERVICES BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET</p>
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U.S. Registration No.	3356410	Application Date	08/17/2006
Registration Date	12/18/2007	Foreign Priority Date	NONE
Word Mark	NONE		
Design Mark			
Description of Mark	NONE		
Goods/Services	Class 036. First use: First Use: 2006/06/27 First Use In Commerce: 2006/06/27		

	<p>FINANCIAL SERVICES, NAMELY, BANKING AND CREDIT SERVICES; PROVIDING CREDIT CARD, DEBIT CARD, CHARGE CARD AND STORED VALUE PREPAID CARD SERVICES; BANKING SERVICES, BILL PAYMENT, CREDIT CARD SERVICES, DEBIT CARD SERVICES, CHARGE CARD SERVICES, CASH DISBURSEMENT, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; BILL PAYMENT SERVICES; AUTOMATED TELLER MACHINE SERVICES; PROCESSING OF ELECTRONIC BILL PAYMENT FINANCIAL TRANSACTIONS ON-LINE VIA A COMPUTER DATABASE OR VIA TELECOMMUNICATIONS AND AT POINT OF SALE; ELECTRONIC BILL PAYMENT PROCESSING SERVICES FOR FINANCIAL TRANSACTIONS BY CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; THE PROVISION OF BALANCE DETAILS, DEPOSITS AND WITHDRAWALS OF MONEY TO CARD HOLDERS VIA AUTOMATIC TELLER MACHINES; FINANCIAL SETTLEMENT AND AUTHORIZATION SERVICES RELATING TO PAYMENT CARD TRANSACTIONS; ISSUING AND REDEMPTION OF TRAVELLERS CHECKS; CHECK VERIFICATION AND CHECK CASHING SERVICES; VERIFICATION OF FINANCIAL INFORMATION; PAYER AUTHENTICATION SERVICES, NAMELY, PROVISION OF SERVICES RELATING TO THE AUTHENTICATION OF CARDHOLDERS, MERCHANTS AND BANKS FOR PAYMENT CARD TRANSACTIONS; ELECTRONIC FUNDS TRANSFER AND CURRENCY EXCHANGE SERVICES; DISSEMINATION OF FINANCIAL INFORMATION VIA THE INTERNET AND OTHER COMPUTER NETWORKS; REMOTE BILL PAYMENT SERVICES; STORED VALUE ELECTRONIC PURSE SERVICES, NAMELY, PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT; PROVIDING ELECTRONIC FUNDS AND CURRENCY TRANSFER SERVICES, ELECTRONIC BILL PAYMENTS SERVICES, PREPAID TELEPHONE CALLING CARD SERVICES, CASH DISBURSEMENT SERVICES, AND TRANSACTION AUTHORIZATION AND SETTLEMENT SERVICES; PROVISION OF DEBIT CARD, CREDIT CARD AND PREPAID CARD SERVICES BY MEANS OF RADIO FREQUENCY IDENTIFICATION DEVICES; PROVISION OF DEBIT CARD AND CREDIT CARD SERVICES BY MEANS OF COMMUNICATION AND TELECOMMUNICATION DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED THROUGH MOBILE TELECOMMUNICATIONS MEANS, INCLUDING PAYMENT SERVICES THROUGH WIRELESS DEVICES; THE PROVISION OF FINANCIAL BILL PAYMENT SERVICES FOR THE SUPPORT OF RETAIL SERVICES PROVIDED ON-LINE, THROUGH NETWORKS OR OTHER ELECTRONIC MEANS USING ELECTRONICALLY DIGITIZED INFORMATION; PROVIDING ONLINE STORED VALUE ACCOUNTS IN AN ELECTRONIC ENVIRONMENT FOR USE IN THE SECURE EXCHANGE OF VALUE, INCLUDING ELECTRONIC CASH, OVER COMPUTER NETWORKS, ON-LINE BANKING; FINANCIAL INFORMATION PROCESSING SERVICES PROVIDED OVER THE TELEPHONE AND BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET; PROVISION OF FINANCIAL INFORMATION PROCESSING SERVICES BY MEANS OF A GLOBAL COMPUTER NETWORK OR THE INTERNET</p>
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Attachments	<p>73256484#TMSN.gif (1 page)(bytes) 73294257#TMSN.gif (1 page)(bytes) 74215678#TMSN.gif (1 page)(bytes) 74140100#TMSN.gif (1 page)(bytes) 74350765#TMSN.gif (1 page)(bytes) 74644110#TMSN.gif (1 page)(bytes) 75095085#TMSN.gif (1 page)(bytes) 75278277#TMSN.gif (1 page)(bytes) 78949716#TMSN.jpeg (1 page)(bytes)</p>
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Certificate of Service

The undersigned hereby certifies that a copy of this paper has been served upon all parties, at their address record by Overnight Courier on this date.

Signature	/Suzanne M. Hengl/
Name	Suzanne M. Hengl
Date	04/25/2012

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD**

IN THE MATTER OF APPLICATION

Applicant: Konectome, Inc.
Mark: **2MUNDOS & Design**
Serial No.: 85/297,027
Filed: April 16, 2011
Published in
the **Official Gazette**: March 13, 2012

	X	
MASTERCARD INTERNATIONAL	:	
INCORPORATED,	:	
	:	
Opposer,	:	Opposition No. _____
	:	
v.	:	
	:	
KONECTOME, INC.	:	
	:	
Applicant.	:	
	X	

NOTICE OF OPPOSITION

Opposer, MasterCard International Incorporated, a corporation organized and existing under the laws of the state of Delaware, with a place of business at 2000 Purchase Street, Purchase, New York 10577-2509 (hereinafter referred to as “Opposer” or “MasterCard”) believes that it will be damaged by the registration of United States Trademark Application Serial No. 85/297,027 (hereinafter the “application-in-opposition” unless otherwise specified) filed on April 16, 2011 by Konectome, Inc. (hereinafter “Applicant” unless otherwise specified) for an alleged mark consisting of or comprising an interlocking circular design, in connection with services in International Class 42, and having previously been granted an extension of time to oppose, hereby opposes the same.

The specific grounds for this opposition are as follows:

1. MasterCard is a leading global payments solutions company that provides a variety of services in support of the credit, debit, prepaid and related payment programs of over 22,000 financial institutions and other entities that are its customers. MasterCard's purpose is, *inter alia*, to facilitate various financial services transactions, including the interchange of funds through payment cards, including credit cards and debit cards, as well as to provide related banking, credit and payment card services, electronic funds and currency transfer services, electronic payment services, and network services to facilitate financial payments, and other related products and services. MasterCard owns and administers the MASTERCARD payment card program.

2. More specifically, since 1966, MasterCard has managed a family of well-known, widely accepted payment card brands, including MASTER CHARGE, MASTERCARD, MASTERCARD ELECTRONIC, MAESTRO and CIRRUS, as well as the famous "Interlocking Circles" device, to identify its various services and products. MasterCard initially owned and administered the celebrated MASTER CHARGE payment program and it now owns and administers the MASTERCARD payment card program. MasterCard's business has a global reach and has continued to experience strong growth.

3. There are almost 1.1 billion MASTERCARD payment cards in circulation worldwide bearing the Interlocking Circles device, which have been issued by over 20,000 licensed member financial institutions. Almost one-third of these cards are currently in circulation in the United States. Opposer's MASTERCARD payment cards are accepted at approximately 33 million locations, including retail merchants, automated teller machines and cash advance locations, and over \$3.2 trillion dollars worth of purchases or cash advances were transacted in 2011 alone using a payment card bearing the MASTERCARD and "Interlocking

Circles” device. Each retail establishment, ATM and cash advance location that accepts MasterCard’s payment cards is required to post decals bearing the MASTERCARD and “Interlocking Circles” device at the point of sale. During each of the last three years, MasterCard has expended in excess of \$700,000,000 per year in advertising and promoting its payment card services and other related products and services in connection with its MASTERCARD, MAESTRO and “Interlocking Circles” device marks.

4. Each and every MASTER CHARGE and MASTERCARD payment card that has ever been issued and virtually all advertising therefore has borne MasterCard’s famous and highly distinctive “Interlocking Circles” device.

5. For many years prior to April 11, 2011 or any relevant date upon which Applicant bases any alleged claim of priority, Opposer has used its “Interlocking Circles” device and/or variants in connection with financial services and products, including, but not limited to, banking services and payment, credit, debit, prepaid and stored value card services, electronic payment services, transaction authorization and settlement services, verification of financial information, dissemination of financial information via the internet and other computer networks, and related software products and services.

6. In addition, for many years prior to the filing date of the application-in-opposition or any relevant date upon which Applicant bases any alleged claim of priority, the mark CIRRUS and light blue and dark blue “Interlocking Circles” device have been used by Opposer, its predecessors in interest, subsidiaries, and other licensed financial institutions in connection with the CIRRUS ATM and debit card program. The Cirrus Interlocking Circles device mark has been used continuously for nearly twenty years and said mark has not been abandoned.

7. The Cirrus Interlocking Circles device appears on at least 500 million cards accepted at approximately 1.8 million ATMs worldwide, and on more than 150 million cards in the U.S. which are accepted at an estimated 400,000 ATMs domestically. Over the years, significant sums have been spent in marketing, promoting and/or using the Cirrus Interlocking Circles device. As a result of extensive advertising, promotion, card usage, point of sale signage and other usage, the Cirrus Interlocking Circles device has become famous and represents an asset of enormous goodwill of inestimable value to Opposer.

8. In addition to its prior common law rights in the MasterCard and "Interlocking Circles" device, Cirrus and Interlocking Circles device and/or variants, MasterCard is also the owner of numerous United States trademark and service mark applications and registrations, each of which incorporates the "Interlocking Circles" device, and/or variants, including, but not limited to, the following:

MARK	SERIAL/ REG. NO.	FILING/ REG. DATE	FIRST USE DATE	IDENTIFICATION OF GOODS/SERVICES
MASTERCARD & Interlocking Circles Design	1,257,853	11/15/1983	2/11/1980	36: Financial Services-Namely, Providing Bank Card Services
Interlocking Circles and Globes Design	1,270,220	3/13/1984	12/9/1980	36: Travelers Check Services-Namely, Administration of Issuance, Redemption and Processing of Travelers Checks
Interlocking Circles Design	1,723,718	10/13/1992	2/1990	16: printed matter and publications; namely, credit, debit and charge cards, travellers cheques, pamphlets, brochures, newsletters and magazines of a financial nature 36: financial services; namely, providing credit, debit and charge card, travellers cheque, cash disbursement, and transaction authorization and settlement services
Globe Hologram Design	1,738,276	12/8/1992	2/1990	16: printed matter and publications; namely, credit, debit and charge cards, travellers cheques, pamphlets, brochures, newsletters and magazines of a financial nature 36: financial services; namely, providing credit, debit and charge card, travellers cheque, cash disbursement, and transaction authorization and settlement services

MASTERCARD & Interlocking Circles Design	1,890,786	4/25/1995	4/1991	6: metal key chains 9: calculators 14: watches, clocks, metal tie pins 16: pens, pencils, pen stands, paper weights, letter openers, notebooks, metal book marks 18: umbrellas, luggage, garment bags for travel, toiletry cases sold empty, duffel bags, attache cases, carry-on bags, tote bags, wallets, business card cases, credit card cases 20: non-metal key rings, luggage tags 21: mugs 24: towels 25: shirts, jackets, sweaters, sweat shirts, visors, caps 28: Christmas tree decorations, tennis balls, golf balls, soccer balls, golf tees
Interlocking Circles Design	2,038,134	2/18/1997	8/19/1992	9: electronic data carriers in the form of magnetically encoded cards 16: printed matter and publications, namely, pamphlets, brochures, newsletters and magazines of a financial nature 36: financial services, namely, providing debit card services
Interlocking Circles and Globes Design	2,077,221	7/8/1997	4/1993	36: travelers cheque services, namely the administration of [issuance,] redemption and processing of travelers cheques
MASTERCARD CORPORATE & Globe Hologram Design	2,212,340	12/22/1998	1/31/1997	36: financial services, namely, providing credit card, debit card, cash disbursement, and transaction authorization and settlement services
Interlocking Circles Design	3,356,377	12/18/2007	6/27/2006	35: association services, namely, promoting the interests of banks, credit unions, and other regulated financial institutions
MASTERCARD & Interlocking Circles Design	2,168,736	6/30/1998	2/1990	9: electronic data carriers in the form of magnetically encoded cards 16: printed matter and publications, namely, credit, debit and charge cards, travelers cheques, and pamphlets, brochures, newsletters and magazines of a financial nature 36: financial services, namely, providing credit, debit and charge card services, administration of the issuance, redemption and processing of travelers cheques, travel financial assistance, cash disbursement and transaction authorization and settlement services 39: travel assistance services, namely, arranging travel tours, making replacement and emergency reservations and booking for transportation
CIRRUS & Interlocking Circles Design	85440050	10/05/2011	06/1/1992	36: financial services, namely, cash disbursement through use of automatic teller machine and automatic teller machine (ATM) banking services.

MASTERCARD WORLDWIDE & Interlocking Circles Design	3,356,407	12/18/2007	6/27/2006	36: financial services, namely, banking and credit services; providing credit card, debit card, charge card and stored value prepaid card services; banking services, bill payment, credit card services, debit card services, charge card services, cash disbursement, providing online stored value accounts in an electronic environment; bill payment services; automated teller machine services; processing of electronic bill payment financial transactions on-line via a computer database or via telecommunications and at point of sale; electronic bill payment processing services for financial transactions by card holders via automatic teller machines; the provision of balance details, deposits and withdrawals of money to card holders via automatic teller machines; financial settlement and authorization services relating to payment card transactions; issuing and redemption of travellers checks; check verification and check cashing services; verification of financial information; payer authentication services, namely, provision of services relating to the authentication of cardholders, merchants and banks for payment card transactions; electronic funds transfer and currency exchange services; dissemination of financial information via the internet and other computer networks; remote bill payment services; stored value electronic purse services, namely, providing online stored value accounts in an electronic environment; providing electronic funds and currency transfer services, electronic bill payments services, prepaid telephone calling card services, cash disbursement services, and transaction authorization and settlement services; provision of debit card, credit card and prepaid card services by means of radio frequency identification devices; provision of debit card and credit card services by means of communication and telecommunication devices; the provision of financial bill payment services for the support of retail services provided through mobile telecommunications means, including payment services through wireless devices; the provision of financial bill payment services for the support of retail services provided on-line, through networks or other electronic means using electronically digitized information; providing online stored value accounts in an electronic environment for use in the secure exchange of value, including electronic cash, over computer networks, on-line banking; financial information processing services provided over the telephone and by means of a global computer network or the internet; provision of financial information processing services by means of a global computer network or the internet
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MASTERCARD WORLDWIDE & Interlocking Circles Design	3,356,408	12/18/2007	6/27/2006	36: financial services, namely, banking and credit services; providing credit card, debit card, charge card and stored value prepaid card services; banking services, bill payment, credit card services, debit card services, charge card services, cash disbursement, providing online stored value accounts in an electronic environment; bill payment services; automated teller machine services; processing of electronic bill payment financial transactions on-line via a computer database or via telecommunications and at point of sale; electronic bill payment processing services for financial transactions by card holders via automatic teller machines; the provision of balance details, deposits and withdrawals of money to card holders via automatic teller machines; financial settlement and authorization services relating to payment card transactions; issuing and redemption of travellers checks; check verification and check cashing services; verification of financial information; payer authentication services, namely, provision of services relating to the authentication of cardholders, merchants and banks for payment card transactions; electronic funds transfer and currency exchange services; dissemination of financial information via the internet and other computer networks; remote bill payment services; stored value electronic purse services, namely, providing online stored value accounts in an electronic environment; providing electronic funds and currency transfer services, electronic bill payments services, prepaid telephone calling card services, cash disbursement services, and transaction authorization and settlement services; provision of debit card, credit card and prepaid card services by means of radio frequency identification devices; provision of debit card and credit card services by means of communication and telecommunication devices; the provision of financial bill payment services for the support of retail services provided through mobile telecommunications means, including payment services through wireless devices; the provision of financial bill payment services for the support of retail services provided on-line, through networks or other electronic means using electronically digitized information; providing online stored value accounts in an electronic environment for use in the secure exchange of value, including electronic cash, over computer networks, on-line banking; financial information processing services provided over the telephone and by means of a global computer network or the internet; provision of financial information processing services by means of a global computer network or the internet
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Interlocking Circles Design	3,356,409	12/18/2007	6/27/2006	<p>36: financial services, namely, banking and credit services; providing credit card, debit card, charge card and stored value prepaid card services; banking services, bill payment, credit card services, debit card services, charge card services, cash disbursement, providing online stored value accounts in an electronic environment; bill payment services; automated teller machine services; processing of electronic bill payment financial transactions on-line via a computer database or via telecommunications and at point of sale; electronic bill payment processing services for financial transactions by card holders via automatic teller machines; the provision of balance details, deposits and withdrawals of money to card holders via automatic teller machines; financial settlement and authorization services relating to payment card transactions; issuing and redemption of travellers checks; check verification and check cashing services; verification of financial information; payer authentication services, namely, provision of services relating to the authentication of cardholders, merchants and banks for payment card transactions; electronic funds transfer and currency exchange services; dissemination of financial information via the internet and other computer networks; remote bill payment services; stored value electronic purse services, namely, providing online stored value accounts in an electronic environment; providing electronic funds and currency transfer services, electronic bill payments services, prepaid telephone calling card services, cash disbursement services, and transaction authorization and settlement services; provision of debit card, credit card and prepaid card services by means of radio frequency identification devices; provision of debit card and credit card services by means of communication and telecommunication devices; the provision of financial bill payment services for the support of retail services provided through mobile telecommunications means, including payment services through wireless devices; the provision of financial bill payment services for the support of retail services provided on-line, through networks or other electronic means using electronically digitized information; providing online stored value accounts in an electronic environment for use in the secure exchange of value, including electronic cash, over computer networks, on-line banking; financial information processing services provided over the telephone and by means of a global computer network or the internet; provision of financial information processing services by means of a global computer network or the internet</p>
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Interlocking Circles Design	3,356,410	12/18/2007	6/27/2006	36: financial services, namely, banking and credit services; providing credit card, debit card, charge card and stored value prepaid card services; banking services, bill payment, credit card services, debit card services, charge card services, cash disbursement, providing online stored value accounts in an electronic environment; bill payment services; automated teller machine services; processing of electronic bill payment financial transactions on-line via a computer database or via telecommunications and at point of sale; electronic bill payment processing services for financial transactions by card holders via automatic teller machines; the provision of balance details, deposits and withdrawals of money to card holders via automatic teller machines; financial settlement and authorization services relating to payment card transactions; issuing and redemption of travellers checks; check verification and check cashing services; verification of financial information; payer authentication services, namely, provision of services relating to the authentication of cardholders, merchants and banks for payment card transactions; electronic funds transfer and currency exchange services; dissemination of financial information via the internet and other computer networks; remote bill payment services; stored value electronic purse services, namely, providing online stored value accounts in an electronic environment; providing electronic funds and currency transfer services, electronic bill payments services, prepaid telephone calling card services, cash disbursement services, and transaction authorization and settlement services; provision of debit card, credit card and prepaid card services by means of radio frequency identification devices; provision of debit card and credit card services by means of communication and telecommunication devices; the provision of financial bill payment services for the support of retail services provided through mobile telecommunications means, including payment services through wireless devices; the provision of financial bill payment services for the support of retail services provided on-line, through networks or other electronic means using electronically digitized information; providing online stored value accounts in an electronic environment for use in the secure exchange of value, including electronic cash, over computer networks, on-line banking; financial information processing services provided over the telephone and by means of a global computer network or the internet; provision of financial information processing services by means of a global computer network or the internet
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These applications/registrations are valid and subsisting, uncanceled and unrevoked, and in full force and effect, and many of the foregoing are incontestable pursuant to 15 U.S.C. § 1065.

Hereinafter, MasterCard's foregoing marks, including those registered and/or used in commerce, are referred to individually and/or collectively as the "Interlocking Circles Mark".

9. Use of the Interlocking Circles Mark has been continuous and has not been abandoned. As a result of extensive advertising, promotion, card usage, point of sale signage and other usage, the Interlocking Circles Mark has become famous and is one the most renowned brands in the world, including in the United States. It represents an asset of enormous goodwill and of inestimable value to MasterCard.

10. Since long prior to Applicant's filing of the application-in-opposition, MasterCard has used its Interlocking Circles Mark, not only in connection with a wide range of financial products and services, but other related or complementary services/products as well. By way of example, MasterCard currently has both Facebook and Twitter accounts that allow followers to participate in discussions and competitions, provide feedback on MasterCard services, and engage in social networking.

11. Given MasterCard's long, extensive and widespread use, advertising, promotion and registration of its Interlocking Circles Mark, consumers and the trade have become accustomed to associating marks containing the Interlocking Circles Mark and/or interlocking circles designs as used in connection with financial and banking services, as well as with related services/products, with MasterCard.

12. On information and belief, on April 16, 2011, Applicant Konectome, Inc., a corporation with an address at 301 Mission Street, San Francisco, California 94105, filed U.S. Application Serial No. 85/297,027 to register a mark comprised of a light blue and dark blue interlocking circles design above the word "2MUNDOS" based on an intent to use the mark in connection with "Computer services, namely, creating an on-line community for registered users

to participate in discussions, get feedback from their peers, form virtual communities, and engage in social networking; Computer services, namely, creating an online community for registered users to participate in competitions, showcase their skills, get feedback from their peers, form virtual communities, and engage in social networking; computer services, namely, software development and integration services, computer programming, design and development of computer games, video games, online games, game related applications and development tools for others; providing a website featuring non-downloadable software tools for use in accessing, playing and tracking performance of computer games; application service provider featuring software for social networking and games, and to enable uploading, posting, showing, displaying, tagging, blogging, sharing or otherwise providing electronic media or information via the Internet; computer programming services, namely, content creation for virtual worlds and three dimensional platforms” in International Class 42.

13. Registration of Applicant’s alleged mark, which is the subject of the application-in-opposition, is barred by the provisions of Section 2(d) of the Trademark Act of 1946 because the said mark consists of or comprises a mark which so resembles MasterCard’s Interlocking Circles Mark, which has been in use and is also the subject of prior registrations and/or previously filed applications to register such mark in the United States Patent and Trademark Office, as to be likely, when used in connection with the alleged services of Applicant, to cause confusion.

14. There is no issue as to priority. Applicant’s alleged intent to use application is subsequent to Opposer’s use of its Interlocking Circles Mark, the dates of registration and/or the filing dates of the foregoing applications to register the Interlocking Circles Mark. Applicant’s alleged mark, which is comprised of an interlocking circular design, and Opposer’s Interlocking

Circles Mark are similar. On information and belief, the services that Applicant purportedly offers or intends to offer in connection with its alleged mark are similar, related or complementary to the services/products MasterCard offers in connection with its famous Interlocking Circles Mark.

15. Applicant's alleged mark shown in the application-in-opposition so resembles the Opposer's previously used and registered Interlocking Circles Mark as to be likely, when used in connection with Applicant's services, to cause confusion amongst consumers and/or the trade, or to lead to the mistaken belief that Applicant's mark which is shown in the application-in-opposition is a version of Opposer's Interlocking Circles Mark, thereby deceiving the public, causing confusion and causing damage to Opposer, all within the meaning of 15 U.S.C. § 1063.

16. The likelihood of confusion that would also arise from the concurrent use and registration of the applied for mark with MasterCard's use and registration of its Interlocking Circles Mark is that: (a) persons are likely to believe that Applicant's services have their source in Opposer; and/or (b) Applicant and its services are in some way legitimately connected or affiliated with, sponsored, approved, endorsed or licensed by Opposer when, in fact, they are not. Accordingly, registration of Applicant's mark which is the subject of the application-in-opposition is barred by the provision of Section 2(d) of the Trademark Act of 1946, 15 U.S.C. § 1052(d).

17. Further, registration and use of Applicant's alleged mark incorporating a light blue and dark blue interlocking circles design as shown in the application-in-opposition would likely dilute the distinctiveness of MasterCard's famous and highly distinctive Interlocking Circles Mark, which became famous long prior to the filing of Applicant's application-in-opposition, or any alleged first use by Applicant of the design shown in U.S. Application Serial

No. 85/297,027, in violation of 15 U.S.C. § 1125(c). Accordingly, Applicant's alleged mark at issue is not entitled to registration under 15 U.S.C. § 1052(f) and Section 13 of the Lanham Act, 15 U.S.C. § 1063.

18. Opposer will be damaged by the issuance of the registration sought by Applicant because such registration would support and assist Applicant in the confusing, misleading, deceptive and/or dilutive use of Applicant's alleged mark which is shown in the application-in-opposition, and would give color of exclusive statutory rights to Applicant in violation of the prior and superior rights of MasterCard in the United States.

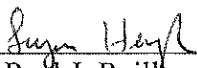
19. In view of the foregoing, issuance of a registration to Applicant for its claimed mark which is shown in the application-in-opposition would be damaging to Opposer's common law marks and federal registrations within the meaning of Section 13 of the Lanham Act, 15 U.S.C. §1063.

WHEREFORE, Opposer prays that this opposition be sustained in its favor, that registration be denied to Applicant on its Application Serial No. 85/297,027 and that the Board grant all further relief in favor of Opposer that is necessary and just.

Respectfully submitted,

BAKER BOTTS L.L.P.

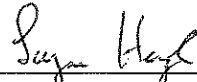
Dated: April 25, 2012

By: 
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CERTIFICATE OF SERVICE

I hereby certify that on this 25th day of April, 2012 a copy of the foregoing, NOTICE OF OPPOSITION, was served on the attorney of record for Applicant via Federal Express, in an envelope with sufficient postage addressed to:

Raj Abhyanker, Esq.
Raj Abhyanker, P.C.
1580 W El Camino Real, Suite 8
Mountain View, CA 94040-2462

By: 
Suzanne M. Hengl